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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,

Plaintiff,

vs.

GOOGLE, INC.,

Defendant.

Case No. C 10-3561 WHA

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL RESPONSE OF DR. JAMES
R. KEARL, RULE 706 EXPERT, TO
GOOGLE'S RESPONSE TO ORACLE'S
MOTION IN LIMINE #6 REGARDING
RULE 706 EXPERT, PROFESSOR JAMES
KEARL**

Dept.: Courtroom 8, 19th Floor
Judge: Hon. William H. Alsup

Pursuant to the Northern District of California's Civil Local Rules 7-11 and 79-5(d) and (e), and for the reasons set forth in the accompanying declaration of John L. Cooper, Rule 706 Expert, Dr. James R. Kearl ("Dr. Kearl"), hereby brings this Administrative Motion to File Under Seal the following documents ("Documents"):

- Response of Dr. James R. Kearl, Rule 706 Expert, to Google's Response to Oracle's Motion in Limine #6 Regarding Rule 706 Expert, Professor James Kearl;
- Exhibit A to the Declaration of Dr. James R. Kearl in Support of Response of Dr. James R. Kearl, Rule 706 Expert, to Google's Response to Oracle's Motion in Limine #6 Regarding Rule 706 Expert, Professor James Kearl;

- Exhibit B to the Declaration of Dr. James R. Kearl in Support of Response of Dr. James R. Kearl, Rule 706 Expert, to Google's Response to Oracle's Motion in Limine #6 Regarding Rule 706 Expert, Professor James Kearl;
- Exhibit C to the Declaration of Dr. James R. Kearl in Support of Response of Dr. James R. Kearl, Rule 706 Expert, to Google's Response to Oracle's Motion in Limine #6 Regarding Rule 706 Expert, Professor James Kearl

The Documents contain information designated by Oracle America, Inc. and Google, Inc. as "Confidential—Attorney's Eyes Only" under the Protective Order.

In an abundance of caution, Dr. Kearl has not submitted redacted versions, as there appears to be a dispute between the parties regarding what portions should be sealed. *See, e.g.*, Dkt. 1599. Dr. Kearl respectfully requests to file a redacted version of the Documents, should the Court so choose, after the parties have resolved their dispute regarding which portions, if any, should be sealed. Dr. Kearl respectfully requests that the unredacted Documents remain under seal.

Dated: April 13, 2016

FARELLA BRAUN + MARTEL LLP

By: /s/ John L. Cooper
John L. Cooper

Attorneys for Rule 706 Expert,
Dr. James R. Kearl